



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

**May 7, 2015**

Russell H. Brillon, CFO  
Leaktite Corporation  
40 Francis Street  
Leominster, Massachusetts 01453

**RE: Leominster**  
Transmittal No.: X264719  
Application No.: CE-15-004  
Class: *SM-25*  
FMF No.: 11883  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Brillon:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the plastic container manufacturing at your facility located at 40 Francis Street in Leominster, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

## **1. DESCRIPTION OF FACILITY AND APPLICATION**

The Permittee has been in business since 1945. In accordance with Consent Order ACOP-CE-15-9004-27, the Permittee submitted this Application to request a volatile organic compounds (“VOCs”) emission limit from the printing operations at both manufacturing buildings.

The Facility produces high- and low-density polyethylene products by injection molding. The Facility also uses sheet recycled polyethylene terephthalate or high-density polyethylene to thermoform products. The products are finished by affixing a laser printed labels or printing. The Facility operates eight Kase rotational off-set flexographic printers using low VOC ultraviolet cure inks at both buildings. Ethyl Acetate is used to clean ink from offset printing equipment, and emitted as fugitive VOC emissions. Injection mold cleaners containing up to 99% n-heptane for cleaning and protecting the molds at both buildings also contribute incidental VOC emissions.

In addition to the above process equipment, the following equipment is used at the Facility: grinders, plastic resin storage silos and space heaters. Except for the printing operation and mold cleaning, air emissions from other processes and equipment are insignificant. Therefore those processes and equipment are exempt from 310 CMR 7.02 Plan Approval, and not discussed further in this Plan Approval.

MassDEP has determined that the Best Available Control Technology requirement for VOC will be achieved by best management practices for the use of VOC containing materials in accordance with Table 6 of this Plan Approval.

## **2. EMISSION UNIT (EU) IDENTIFICATION**

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

<b>Table 1</b>			
<b>EU</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device</b>
1	Off-set Printing Equipment Cleaning	None	None
2	Injection Mold Cleaner	None	None

**Table 1 Key:**

EU = Emission Unit Number

### 3. APPLICABLE REQUIREMENTS

#### A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

<b>Table 2</b>			
<b>EU</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit (Note 1)</b>
1	None	VOC	1.5 TPM, 9.0 TPY
2	None	VOC	0.1 TPM, 0.5 TPY
1 and 2	None	VOC	1.5 TPM, 9.5 TPY

**Table 2 Key:**

EU = Emission Unit Number

TPM = tons per month

VOC = Volatile Organic Compounds

TPY = tons per consecutive 12-month period

**Table 2 Note:**

Note 1: To calculate actual emissions, the Permittee shall assume that all solvents used are 100% emitted.

#### B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

<b>Table 3</b>	
<b>EU</b>	<b>Monitoring and Testing Requirements</b>
1 and 2	1. The Permittee shall track solvents usage daily and reconcile with monthly inventory such that records can be maintained to determine compliance status with the emission limits contained in Table 2 above.
	2. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

**Table 3 Key:**

EU = Emission Unit Number

VOC = Volatile Organic Compounds

<b>Table 4</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
1 and 2	1. The Permittee shall maintain records of material usage to determine compliance status with the emission limits monthly and rolling 12-month contained in Table 2 above.
Facility-wide	2. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 <sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping">http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping</a> .
	3. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	4. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	7. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	8. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	9. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

EU = Emission Unit Number

VOC = Volatile Organic Compounds

SOMP = Standard Operating and Maintenance Procedure

USEPA = United States Environmental Protection Agency

<b>Table 5</b>	
<b>EU</b>	<b>Reporting Requirements</b>
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Central Regional Office of MassDEP, BWP Permit Chief by telephone: 508-767-2845, email: Roseanna.Stanley@massmail.state.ma.us or fax : 508-792-7621, as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. Pursuant to with 310 CMR 7.12(1)(a)7., the Permittee is required to file Source Registration every three years as a condition of this Plan Approval.
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

**Table 5 Key:**

EU = Emission Unit Number

#### **4. SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee is subject to and shall comply with the Special Terms and Conditions as contained in Table 6:

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
1	1. The Permittee shall use the following best management practices to minimize VOC emissions: <ul style="list-style-type: none"> <li>• Use the smallest amount of VOC containing materials needed to perform the task,</li> <li>• Use solvent containers that minimize solvent losses,</li> <li>• Keep all used rags containing solvents in closed containers, and</li> <li>• Cover or close any container with VOC containing materials, including waste collection containers, when materials are not being added to or removed from the container.</li> </ul>
	2. The Permittee shall train employees on the best management practices regarding solvent usage and conservation.
	3. The Permittee shall continue research for alternative solvent with lower or no VOC content.
	4. The Permittee shall continue employ alternative technologies for label application to reduce solvent usage during printing operation.

**Table 6 Key:**

EU = Emission Unit Number

VOC = Volatile Organic Compounds

## **5. GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **7. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Hui Liang by telephone at 508-767-2762, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

---

Roseanna E. Stanley  
Permit Chief  
Bureau of Air and Waste

Enclosure

ecc: Leominster Board of Health  
Leominster Fire Department  
MassDEP/Boston - Yi Tian  
Environmental Compliance Services, Inc.